

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----X		
In re)	Chapter 11
)	
TELEGLOBE COMMUNICATIONS)	
CORPORATION, <i>et al.</i> ,)	Jointly Administered
)	Bankr. Case No. 02-11518(MFW)
)	
Debtors.)	
-----X		
TELEGLOBE COMMUNICATIONS)	
CORPORATION,)	
<i>et al.</i> ,)	C.A. No. 04-1266 (SLR)
)	
Plaintiffs,)	
)	
v.)	
)	
BCE INC., <i>et al.</i> ,)	
)	
Defendants.)	
-----X		

SUPPLEMENT TO DISCOVERY PLAN AND SCHEDULING ORDER

WHEREAS, on October 14, 2004, the Court entered a "Discovery Plan and Scheduling Order" (Dkt. 43) (the "Order").

WHEREAS, paragraph 2(g) of the Order provides certain deadlines with respect to expert discovery.

WHEREAS, upon oral direction of the Court, the parties have conferred to extend those deadlines.

WHEREAS, paragraph 9 of the Order provides that "the deadlines set forth herein maybe extended by the parties' agreement without further order of the Court, provided the parties notify the Court promptly of any such extensions."

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties,
as follows:

1. Reports from retained experts pursuant to Rule 26(a)(2) on issues on which any party has the burden of proof shall be due on March 1, 2006.
2. Rebuttal reports of experts shall be due on April 14, 2006.
3. Document discovery with respect to expert witnesses shall be completed by April 21, 2006.
4. Expert depositions shall be completed by May 6, 2006.
5. Daubert motions shall be submitted by May 15, 2006. Thereafter, briefing will be completed on such motions pursuant to Local Rule 7.1.2.
6. No party shall use this Stipulation, nor the agreement to dates later than those contemplated in the original Order, to attempt in any way to move, continue, cancel and/or postpone the trial date set forth in the Order. Nor shall any party use in any way any immaterial modifications to this Stipulation to attempt to move, continue, cancel and/or postpone the trial date set forth in the Order.

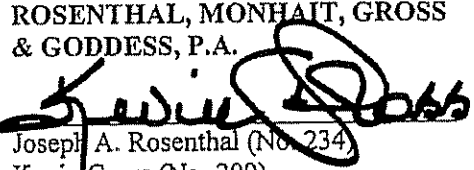
Dated: December ____, 2005

RICHARDS, LAYTON & FINGER P.A.

Gregory V. Varallo (No. 2242)
C. Malcolm Cochran, IV (No. 2377)
Russell C. Silberglied (No. 3462)
Chad M. Shandler (No. 3796)
One Rodney Square
P.O. Box 551
Wilmington, Delaware 19801
Telephone: (302) 651-7700

Attorneys for the Debtors

**ROSENTHAL, MONHAIT, GROSS
& GODDESS, P.A.**



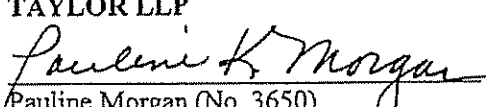
Joseph A. Rosenthal (No. 234)
Kevin Gross (No. 209)
919 Market Street, Suite 1401
P.O. Box 1070
Wilmington, Delaware 19899-1070
Telephone: (302) 656-4433

-and-

John P. Amato
HAHN & HESSEN LLP
488 Madison Avenue
New York, New York 10022
Telephone: (212) 478-7200

Attorneys for the Committee

**YOUNG CONAWAY STARGATT &
TAYLOR LLP**



Pauline Morgan (No. 3650)
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19899-0391
Telephone: (302) 571-6600

-and-

George J. Wade
Daniel Schimmel
Shearman & Sterling LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212)

Attorneys for Defendants